

REMARKS

The Office Action dated November 2, 2007, has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1-18 are pending in the application. Claims 1-7, 9-13, and 15-16 have been amended to more particularly point out and distinctly claim the subject matter of the invention. No new matter is added. Claims 1-18 are submitted for reconsideration in view of the following.

Rejection under 35 U.S.C. §102(a)

Claims 15-16 were rejected under 35 U.S.C. §102(a) as being anticipated by Puuskari (US 6,728,208 – hereinafter Puuskari). The rejection is traversed as follows.

Claim 15 is generally directed to an apparatus that includes a plurality of transmission units, where each of the transmission units are configured to communicate with a network device using a single packet data context and where each of the transmission units has a unique internet protocol address.

Claim 16 is generally directed to an apparatus that includes a plurality of transmission means for communicating information in a communications network, where each of the transmission means are configured to communicate with a network device using a single packet data context and where each of the transmission means has a unique internet protocol address.

Claims 15 and 16 each recite limitations that are not disclosed or suggested by Puuskari.

Puuskari is generally directed to a mobile communications system where each data packet is arranged to carry at least one quality of service parameter. This quality of service parameter facilitates the scheduling and policing of data packet transmissions. However, Puuskari fails to disclose or suggest, at least, “a plurality of transmission units; wherein each of the plurality of transmission units are configured to communicate with a network device using a single packet data context; and wherein each of the plurality of transmission units has a unique internet protocol address,” as recited in claim 15, and analogously in claim 16. Instead, Puuskari discloses a mobile terminal that uses a packet data protocol context to communicate with a communication system.

The Office Action attempted to support the §102(a) rejection by citing Puuskari at column 1, lines 36-42, column 7, lines 5-10, column 18, lines 40-55, column 17, lines 1-6 and lines 41-55, column 18, lines 40-55, column 10, lines 4-7, and the Puuskari Abstract. However, these passages fail to disclose the limitations of claims 15 and 16.

For example, the Puuskari Abstract along with column 17, lines 1-6, of Puuskari disclose a communication system that includes a mobile station and a GGSN that communicate with one another using a single packet data protocol context. However, this relationship between a mobile station and a GGSN is not anticipatory of “a plurality of transmission units...configured to communicate with a network device using a single packet data context to transmit data to a network entity.” Indeed, the circuitry and/or

logical instructions to perform the limitations of claims 15 and 16 would be impossible to perform using Puuskari.

As a further example, Puuskari, at column 17, lines 41-55, and column 18, lines 40-55, discloses a data transmission method and system for a mobile communications system that includes packet radio serving nodes, packet radio gateway nodes, and an IP network interconnecting the packet radio serving nodes and the packet radio gateway nodes. The data transmission method and system also include setting up a single packet data protocol context in one of the packet radio gateway nodes for a mobile packet data terminal for routing data packets through the mobile communications system between the mobile packet data terminal and an external communication system.

Though these passages disclose a mobile packet data terminal communicating with an external communication system via a single packet data protocol context, these passages are void of “a plurality of transmission units...configured to communicate with a network device using a single packet data context to transmit data to a network entity...wherein each of the plurality of transmission units has a unique internet protocol address,” as recited in claim 15, and analogously in claim 16. Clearly, transmitting data from a mobile terminal to an external communication system using a packet data protocol context is not anticipatory of multiple transmission units, each with a unique IP address, transmitting data to a network entity using a single packet data context.

Accordingly, Puuskari fails to disclose or suggest each limitation of claims 15 and 16. Therefore, applicants respectfully request that the §102(a) rejection of claims 15 and 16 be withdrawn.

Rejection under 35 U.S.C. §102(e)

Claims 1-2, 6-8, and 11-14 were rejected under 35 U.S.C. §102(e) as being anticipated by Maclean (2002/0101859). Applicants note that in a previous Office Action, mailed on July 25, 2007, Maclean was presented as not disclosing all the limitations of independent claims 1 and 11 by not disclosing a single packet data context for a plurality of IP addresses. However, in the present Office Action, Maclean is presented as reciting all of the limitations of independent claims 1 and 11. Nevertheless, the rejection is traversed.

Claim 1, upon which claims 2, 6-8, and 17 depend, is generally directed toward a data transmission method that includes employing a packet protocol for data transmission and identifying at least some participants of the data transmission with different internet protocol addresses, where the participants include at least one terminal equipment unit, a mobile station with a mobile termination, and a network device. The method also includes activating a packet data context for data transmission between identified participants, associating one packet data context with all of the internet protocol addresses of the participants, and transmitting data between the identified participants.

Claim 11, upon which claims 12-14 depend, is generally directed toward a telecommunication system that includes a first unit comprising a mobile termination and one or more units of terminal equipment, each identified by a different internet protocol, and a second unit comprising a network device. The first unit and the second unit are configured to communicate with each other using a packet protocol for data transmission, where at least some participating units of the data transmission are identified with different internet protocol addresses, where the first and the second unit are configured to activate a packet data context for data transmission between the participating units, and where the first unit and the second unit are configured to associate one packet data context with all of the internet protocol addresses of the participating units.

Claims 1 and 11 each recite limitations that are not disclosed by Maclean.

Maclean generally discloses communicating between nodes in different wireless networks. As explained particularly at paragraphs [0042] to [0044], Maclean notes that a PDP context can be created. The associated PDP Context Create request can include two IP addresses: a source IP address, and a destination IP address. Furthermore, intermediate network elements can convert a source IP address from an address within a private network to a public network address for outbound packets, and vice versa for inbound packets.

However, Maclean fails to disclose or suggest, at least, “identifying at least some participants of the data transmission with different internet protocol addresses, wherein the participants comprise at least one terminal equipment unit, a mobile station with a

mobile termination, and a network device; activating a packet data context for data transmission between identified participants; associating one packet data context with all of the internet protocol addresses of the participants; and transmitting data between the identified participants,” as recited in claim 1.

Rather, Maclean discloses a method for communicating between nodes in different wireless networks using network address translators for translating private addresses to public addresses. Maclean notes that a PDP context can be created via a PDP Context Create request that includes a source IP address and a destination IP address. However, Maclean is void of identifying participants including a terminal equipment unit, a mobile station, and a network device, associating a packet data context with the IP addresses of the participants, and transmitting data between the participants. Indeed, the logical instructions and/or circuitry for performing the same is simply not presented in Maclean.

The Office Action attempts to support the §102(e) rejection by citing to Maclean at paragraphs 23-24, 37-39, 42-43 and the Maclean Abstract. For example, paragraphs 42-43 of Maclean disclose an H-GGSN that responds to a PDP Context Create request with a PDP Context Create response. These passages continue by disclosing that the packet carrying the PDP Context Create response contains a source IP address and a destination IP address.

The Office Action takes the position that, because Maclean discloses a packet corresponding to a context request includes a source IP address and a destination IP

address, Maclean anticipates the limitations of claim 1. However, this does not account for all of the limitations of claim 1.

For example, this does not account for the claim 1 participants including a mobile termination, one or more units of terminal equipment, and a network device, each having an IP address associated with a single packet data context. Additionally, not only does Maclean fail to present all of the participants recited in claim 1, but Maclean also fails to provide a disclosure for associating the IP addresses of all of the participants with a single packet data context. Furthermore, Maclean fails to disclose transmitting data between the participants.

Accordingly, Maclean fails to disclose or suggest, at least, “identifying at least some participants of the data transmission with different internet protocol addresses, wherein the participants comprise at least one terminal equipment unit, a mobile station with a mobile termination, and a network device; activating a packet data context for data transmission between identified participants; associating one packet data context with all of the internet protocol addresses of the participants; and transmitting data between the identified participants,” as recited in claim 1.

Therefore, Applicants respectfully request that the §102(e) rejection of claim 1 be withdrawn for at least these reasons. Similarly, Applicants respectfully request that the §102(e) rejection of claim 11 be withdrawn as claim 11 includes similar limitations, though each claim has its own scope. Furthermore, Applicants respectfully request that

the §102(e) rejection of claims 2, 6-8, and 12-14 be withdrawn for at least their dependency from claims 1 and 11.

Rejection under 35 U.S.C. §103(a) in view of Maclean and Puuskari

Claim 3 was rejected under 35 U.S.C. §103(a) as being unpatentable over Maclean in view of Puuskari. The Office Action alleged that Maclean recited the limitations of claim 3, except for unique IP addresses. To remedy the deficiencies of Maclean, the Office Action cited Puuskari as disclosing unique IP addresses. This rejection is traversed as follows.

A combination of Maclean and Puuskari fails to disclose or suggest all the limitations of claim 1, from which claim 3 depends. As presented above, Maclean does not disclose all the limitations of claim 1. Also, Puuskari fails to remedy the deficiencies of Maclean.

As presented above, Puuskari is generally directed to a mobile communications system where each data packet is arranged to carry at least one quality of service parameter. This quality of service parameter facilitates the scheduling and policing of data packet transmissions.

However, Puuskari, similar to Maclean, fails to disclose or suggest “identifying at least some participants of the data transmission with different internet protocol addresses, wherein the participants comprise at least one terminal equipment unit, a mobile station with a mobile termination, and a network device; activating a packet data context for data

transmission between identified participants; associating one packet data context with all of the internet protocol addresses of the participants; and transmitting data between the identified participants,” as recited in claim 1.

Instead, Puuskari discloses setting up a single packet data protocol context for a mobile packet data terminal for routing data packets through a mobile communications system between said mobile packet data terminal and an external communication system. Setting up a single packet protocol context for one mobile terminal to communicate with a communication system is not comparable to activating a single packet data context for at least one terminal equipment unit, a mobile station with a mobile termination, and a network device, each having different IP addresses. In light of the foregoing, it is no surprise that the Office Action’s only use for Puuskari, with respect to claim 3, is to provide for unique IP addresses.

Accordingly, Puuskari, similar to Maclean, fails to disclose or suggest “identifying at least some participants of the data transmission with different internet protocol addresses, wherein the participants comprise at least one terminal equipment unit, a mobile station with a mobile termination, and a network device; activating a packet data context for data transmission between identified participants; associating one packet data context with all of the internet protocol addresses of the participants; and transmitting data between the identified participants,” as recited in claim 1.

As such, a combination of Maclean and Puuskari fails to disclose or suggest all the limitations of claim 1, upon which claim 3 depends. Therefore, Applicants respectfully request that the §103(a) rejection of claim 3 be withdrawn for at least this reason.

Rejection under 35 U.S.C. §103(a) in view of Maclean, Puuskari, and Sidhushayana

Claims 4-5 and 17-18 were rejected under 35 U.S.C. §103(a) as being unpatentable over Maclean in view of Puuskari, and further in view of Sidhushayana et al. (US 2004/0160984 A1 – hereinafter Sidhushayana). The Office Action conceded that Maclean fails to teach sending packet data to more than one IP address, but relies on Sidhushayana to account for the deficiencies of Maclean. Applicant notes that, though the rejection is presented in view of Puuskari, Puuskari is not explicitly mentioned in the rationale behind the rejection of claims 4-5 and 17-18. Nevertheless, this rejection is traversed below.

As stated above, a combination of Maclean and Puuskari fails to disclose or suggest the limitations of claim 1, upon which claims 4-5 and 17 depend. For similar reasons, a combination of Maclean and Puuskari fails to disclose or suggest the limitations of claim 11, upon which claim 18 depends, because claim 11 recites limitations similar to those of claim 1, though every claim has its own scope.

Given the deficiencies of Maclean and Puuskari, the §103(a) rejection of claims 4-5 and 17-18 must be withdrawn because Sidhushayana does not qualify as prior art under §103(a). Sidhushayana was filed in February 18, 2003. The present application was filed

on June 7, 2002, in Finland, and in English. Because the filing date of Sidhushayana fails to antedate the priority date of the present application, Sidhushayana is not a proper prior art reference under §103(a). Accordingly, the combination of references cited in the Office Action fails to support the §103(a). Therefore, Applicants respectfully request that the §103(a) rejection of claims 4-5 and 17-18 should be withdrawn.

Rejection under 35 U.S.C. §103(a) in view of Maclean, Puuskari, and Ibanez

Claim 9 was rejected under 35 U.S.C. 103(a) as being unpatentable over Maclean in view of Puuskari, and further in view of Ibanez et al. (US 2003/0026230). The Office Action concedes that Maclean fails to disclose or suggest a mobile station sending a request for a new IP address, but relies on Ibanez to satisfy the deficiencies of Maclean. Again, Applicants note that no explicit reference to Puuskari in the rationale behind the §103(a) rejection. Applicants also note that Ibanez was cited in a previous Office Action as allegedly anticipating claim 1, from which claim 9 depends. This rejection was traversed and withdrawn upon submission of a response to that previous Office Action. Applicants traverse this rejection for at least the following reasons.

As presented above, a combination of Maclean and Puuskari fails to disclose or suggest the limitations of claim 1, from which claim 9 depends. Similarly, a combination of Maclean, Puuskari, and Ibanez fails to disclose all the limitations of claim 1 because Ibanez fails to remedy the deficiencies of Maclean and Puuskari.

Ibanez generally relates to proxy duplicate address detection for dynamic address allocation. In Figure 1, as described at paragraphs [0024] and [0025] of Ibanez, Ibanez illustrates a block diagram of a mobile telecommunication network that includes a General Packet Radio System (GPRS) system. The system includes terminal equipment (TE) in communication with a mobile terminal (MT). The MT is in communication with a base station subsystem (BSS), which – in turn – is in communication with a mobile switching center/visitor location register (MSC/VLR) and a serving GPRS support node (SGSN). The MSC/VLR is in communication with a gateway mobile switching center (GMSC) and a home location register (HLR). The SGSN is in communication with a gateway GPRS support node (GGSN), which can interconnect the GPRS system with a packet data network (PDN). As illustrated in Figure 1, a second BSS, MT, and TE are also included in the system.

However, Ibanez fails to disclose or suggest, at least, “identifying at least some participants of the data transmission with different internet protocol addresses, wherein the participants comprise at least one terminal equipment unit, a mobile station with a mobile termination, and a network device; activating a packet data context for data transmission between identified participants; associating one packet data context with all of the internet protocol addresses of the participants; and transmitting data between the identified participants,” as recited in claim 1.

Accordingly, a combination of Maclean, Puuskari, and Ibanez fails to disclose or suggest each of the limitations of claim 1, from which claim 9 depends. For at least this reason, Applicants respectfully request that the rejection of claim 9 be withdrawn.

Additionally, the motivation provided by in the Office Action for combining Maclean, Puuskari, and Ibanez is insufficient. Page 5 of the Office Action, where the rejection of claim 9 is presented, states that the motivation for combining Maclean and Ibanez is to enable packet data transmission. This motivation is insufficient justification for combining Ibanez given that Maclean already participates in packet data transmission. Indeed, as presented above, Maclean already discloses communicating data packets of a PDP Context Create request that include a source IP address and a destination IP address. Therefore, justifying the combination of Maclean and Ibanez to enable Maclean to do something that Maclean already does is not proper.

Accordingly, the Office Action fails to make a prima facie case of obviousness as required by a proper §103(a) rejection. Therefore, Applicants respectfully request that the §103(a) rejection of claim 9 be withdrawn for at least this reason.

Rejection under 35 U.S.C. §103(a) in view of Maclean, Puusakari, and Kumaki

Claim 10 was rejected under 35 U.S.C. §103(a) as being unpatentable over Maclean in view of Puuskari, and further in view of Kumaki et al. (US 2002/0191562 – hereinafter Kumaki). The Office Action stated that Maclean fails to teach or suggest a mobile station sending a request for releasing the IP address, but relies on Kumaki to

disclose such a feature. Applicants note that no reference to Puuskari is made in the rationale behind the §103(a) rejection of claim 10. Even so, this rejection is traversed as follows.

As presented above, a combination of Maclean and Puuskari fails to disclose or suggest each limitation of claim 1, from which claim 10 depends. Similarly, a combination of Maclean, Puuskari, and Kumaki fails to disclose or suggest each limitation of claim 1 because Kumaki fails to remedy the deficiencies of Maclean and Puuskari.

Kumaki generally relates to a router device, datagram transfer method, and communication system for realizing handoff control for mobile terminals. At paragraph [0186], Kumaki mentions that an IP address release request is sent from a mobile terminal to an MSR; similarly, at paragraph [0552], Kumaki describes how such an IP release request is processed.

However, Kumaki fails to disclose or suggest, at least, “identifying at least some participants of the data transmission with different internet protocol addresses, wherein the participants comprise at least one terminal equipment unit, a mobile station with a mobile termination, and a network device; activating a packet data context for data transmission between identified participants; associating one packet data context with all of the internet protocol addresses of the participants; and transmitting data between the identified participants,” as recited in claim 1, from which claim 10 depends.

Therefore, it is respectfully requested that the rejection be withdrawn because the combination of Maclean, Puuskari, and Kumaki fails to disclose or suggest all of the elements of any of the presently pending claims.


Conclusion

In light of the foregoing, Puuskari, Maclean, Sidhushayana, Ibanez, and Kumaki fail to disclose or suggest, individually or combined, all the limitations of any of the pending claims. Additionally, referring specifically to the §103(a) rejection of claim 4-5 and 17-18, Sidhushayana is not a proper §103(a) reference. Furthermore, referring to the §103(a) rejection of claim 9, the Office Action failed to make a prima facie case of obviousness because there is no motivation to combine Ibanez with Puuskari or Maclean. Therefore, Applicants respectfully request that the rejections to the pending claims be withdrawn. Additionally, Applicants respectfully request that the pending claims pass to allowance and issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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